

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|  |   |                       |
|--|---|-----------------------|
| David J. Klemann Sr. and Kathryn<br>Klemann, h/w | : | CIVIL ACTION          |
|  | : |                       |
| Plaintiffs                                       | : | NO. 2:14-cv-05024-CDJ |
| v.   | : |                       |
|  | : |                       |
| Covan World-Wide Moving, Inc., et al.            | : |                       |
| Defendants                                       | : |                       |

**DEFENDANTS' DEFENDANTS COVAN WORLD-WIDE MOVING,  
INCORPORATED, COLEMAN AMERICAN MOVING SERVICES, INC. EAGLE  
LEASING, INC. AND JONATHON BLAUROCK ("CONSENTING  
DEFENDANTS") CONSENT TO THE REMOVAL OF THIS ACTION AND  
JOINDER WITH JARO TRANSPORTATION'S NOTICE OF REMOVAL**

Defendants Covan World-Wide Moving, Incorporated, Coleman American Moving Services, Inc. Eagle Leasing, Inc. and Jonathon Blaurock ("Consenting Defendants") consent to the removal of this action to the United States District Court of the Eastern District of Pennsylvania.

Consenting Defendants also join in with JARO Transportation's Notice of Removal and incorporates JARO Transportation's Notice of Removal as though set forth in full.

Coleman American Moving Services, Inc., was served by Certified Mail on or about August 4, 2014. A copy of Plaintiffs' Affidavit of Service is attached hereto as Exhibit "A." Eagle Leasing, Inc., Corvan World-Wide Moving Services, Inc., and Jonathon Blaurock were served by Certified Mail on or about August 5, 2014. Copies of Plaintiffs' Affidavits of Service are attached hereto as Exhibit "B"- "D," respectively.

The undersigned has been expressly authorized by defendants Covan World-Wide Moving, Incorporated, Coleman American Moving Services, Inc. Eagle Leasing, Inc. and Jonathon Blaurock to give this consent.

Further, Covan World-Wide Moving, Incorporated is a corporation organized and existing under the laws of the State of Missouri, with their principal place of business in Midland City, Alabama. In addition, Coleman American Moving Services, Inc. and Eagle Leasing, Inc are corporations organized and existing under the laws of the State of Alabama with their principal place of business in Midland City, Alabama. Mr. Blaurock is a resident and citizen of the State of Kansas.

**RAWLE & HENDERSON LLP**

BY: /s/ Maureen E. Daley

Maureen E. Daley

Identification No. 75000

Cheng I. To

Identification No. 206183

The Widener Building

One South Penn Square

Philadelphia, PA 19107

(215) 575-4200

Date: September 5, 2014

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Consent to Remove/Join in Notice of Removal was served pursuant to the Pennsylvania Rules of Civil Procedure as follows:

**Churchill H. Huston**  
**The Maher Law Firm**  
**1515 Market Street, Suite 810**  
**Philadelphia, PA 19102**  
*Attorney for Plaintiff*

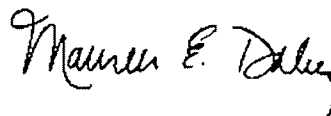
**Jeffrey Elder**  
**810 W. 5<sup>th</sup> Street**  
**Ottawa, Kansas 66106**

**Jaro Transportation Services, Inc.**  
**975 Post Road**  
**Warren, OH 44483**

**Kathleen Hauman**  
**49 Blue Ridge Drive**  
**Stamford, CT 06903**

**Sean Phelan**  
**Weber Gallagher Simpson Stapleton Fires & Newby LLP**  
**2000 Market Street**  
**Suite 1300**  
**Philadelphia, PA 19103**

**RAWLE & HENDERSON LLP**



Dated: September 5, 2014

BY: \_\_\_\_\_

Maureen E. Daley  
The Widener Building  
One South Penn Square  
Philadelphia, PA 19107  
Attorneys for Defendants,  
Covan World-Wide Moving, Inc.,  
Coleman American Moving  
Services, Inc., Eagle Leasing, Inc.  
and Jonathan A. Blaurock.

EXHIBIT “A”

David J. Klemann Sr. And Kathryn Klemann,  
h/w

Plaintiff,

vs.

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY, PA

Filed and Attested by  
PROTHONOTARY  
08 AUG 2014 01:50 pm  
K. EDWARDS

JULY TERM, 2014

Covan World-Wide Moving, Incorporated;  
Coleman American Moving Services, Inc.;  
Eagle Leasing, Inc.; Jeffrey Elder; Jonathan  
A. Blaurock; JARO Transportation Services,  
Inc.; and Kathleen Hauman,

NO. 003975

Defendants

/

**AFFIDAVIT OF SERVICE**

COMMONWEALTH OF PENNSYLVANIA

:

SS

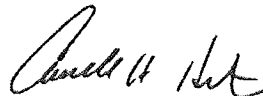
COUNTY OF PHILADELPHIA

:

CHURCHILL H. HUSTON, ESQUIRE, being duly sworn according to law deposes and says that on August 1, 2014, he did file a Civil Action Complaint in the above-entitled matter with the Court; and that on August 4, 2014 at 8:46 a.m., a true and correct copy of the Civil Action Complaint was served upon Coleman American Moving Services; a copy of the Return Receipt for Merchandise article number 70121640000054575502 and USPS tracking confirmation are attached hereto and marked as Exhibit "A".

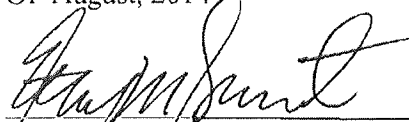
THE MAHER LAW FIRM, P.A.

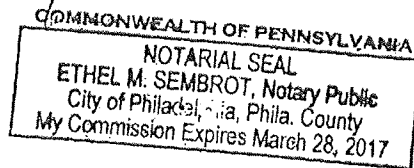
BY:

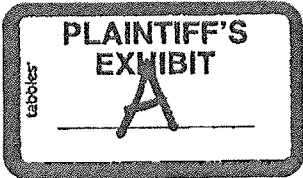


Churchill H. Huston, Esquire  
Attorney for Plaintiff(s)

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 7<sup>th</sup> DAY  
OF August, 2014

  
\_\_\_\_\_  
NOTARY PUBLIC





| SENDER: COMPLETE THIS SECTION   |  | COMPLETE THIS SECTION ON DELIVERY   |  |
|---|--|---|--|
| <p>1. Article Addressed to:</p> <p><i>Coleman American Moving Services</i></p> <p><i>1 Coran Drive</i></p> <p><i>Midland City, AL 36350</i></p> |  | <p>A. Signature <i>[Signature]</i> <input type="checkbox"/> Agent</p> <p>B. Received by (Printed Name) <i>B. Cortez</i> <input type="checkbox"/> Addressee</p> <p>C. Date of Delivery <i>[Blank]</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes</p> <p>If YES, enter delivery address below: <input type="checkbox"/> No</p> |  |
| <p>2. Article Number-<br/>(Transfer from service label)</p> <p><i>7012 1640 0000 5457 5502</i></p>  |  | <p>3. Service Type —</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>  |  |
| <p>PS Form 3811, February 2004</p>  |  | <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>   |  |

102595-02-M-1540

Domestic Return Receipt



English

Customer Service

USPS Mobile

Register / Sign In



USPS Tracking

USPS Tracking™



Customer Service

Have questions? We're here to help.

70121640000054575502

Postal Product:

Features:

Certified Mail™

August 4, 2014 , 8:46 am

Departed

MIDLAND CITY, AL 36350

August 4, 2014 , 8:32 am

Arrived at Unit

MIDLAND CITY, AL 36350

What's your tracking (or receipt) number?

\_\_\_\_\_

Track It

LEGAL

Privacy Policy  
Business Policy  
Terms  
Domestic Mail®

ON USPS.COM

Customer Service  
Help Center  
Tracking & Delivery  
Certified Mail®  
First-Class Mail®  
Priority Mail®

ON ABOUT.USPS.COM

About USPS  
About the Service  
About the Mail  
About the Post Office

OTHER USPS SITES

USPS Store  
USPS Retailer  
USPS Mailbox  
USPS Mailbox Plus

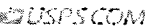


EXHIBIT “B”

David J. Klemann Sr. And Kathryn Klemann,  
h/w

Plaintiff,

vs.

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY, PA

Filed and Attested by  
PROTHONOTARY  
11 AUG 2014 04:50 pm  
OSTROWSKI

JULY TERM, 2014

Covan World-Wide Moving, Incorporated;  
Coleman American Moving Services, Inc.;  
Eagle Leasing, Inc.; Jeffrey Elder; Jonathan  
A. Blaurock; JARO Transportation Services,  
Inc.; and Kathleen Hauman,

NO. 003975

Defendants

/

**AFFIDAVIT OF SERVICE**

COMMONWEALTH OF PENNSYLVANIA

:

SS


COUNTY OF PHILADELPHIA

:

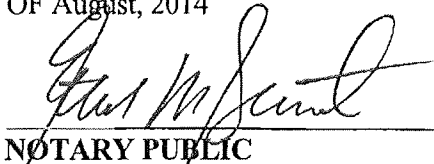
CHURCHILL H. HUSTON, ESQUIRE, being duly sworn according to law deposes and says that on August 1, 2014, he did file a Civil Action Complaint in the above-entitled matter with the Court; and that on August 5, 2014, a true and correct copy of the Civil Action Complaint was served upon Eagle Leasing, Incorporated; a copy of the Return Receipt for Merchandise article number 70121640000054575519 is attached hereto and marked as Exhibit "A".

**THE MAHER LAW FIRM, P.A.**

BY:

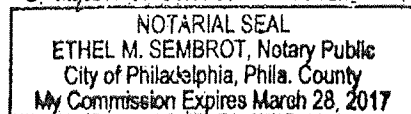
  
Churchill H. Huston, Esquire  
Attorney for Plaintiff(s)

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 11<sup>th</sup> DAY  
OF August, 2014



NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA





| SENDER: COMPLETE THIS SECTION   |  | COMPLETE THIS SECTION ON DELIVERY   |  |
|---|--|---|--|
| <p>1. Article Addressed to:</p> <p>Eagle Leasing, Inc.<br/> P.O. Box 960<br/> Coran Drive<br/> Midland City, AL 36350</p> |  | <p>A. Signature <input checked="" type="checkbox"/> Agent</p> <p>B. Received by (Printed Name) <input type="checkbox"/> Addressee</p> <p>C. Date of Delivery</p>  |  |
| <p>2. Article Number<br/>(Transfer from service label)</p> <p>7012 1640 0000 5457 5519</p>                                |  | <p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> |  |
| <p>PS Form 3811, February 2004</p>  |  | <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>   |  |
| <p>Domestic Return Receipt</p>  |  | <p>102595-02-M-1540</p>   |  |

EXHIBIT “C”

David J. Klemann Sr. And Kathryn Klemann,  
h/w

Plaintiff,

vs.

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY, PA.

Filed and Attested by  
PROTHONOTARY  
11 AUG 2014 03:21 pm  
OSTROWSKI

JULY TERM, 2014

Covan World-Wide Moving, Incorporated;  
Coleman American Moving Services, Inc.;  
Eagle Leasing, Inc.; Jeffrey Elder; Jonathan  
A. Blaurock; JARO Transportation Services,  
Inc.; and Kathleen Hauman,

NO. 003975

Defendants

/

**AFFIDAVIT OF SERVICE**

COMMONWEALTH OF PENNSYLVANIA

:

SS

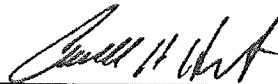
COUNTY OF PHILADELPHIA

:

CHURCHILL H. HUSTON, ESQUIRE, being duly sworn according to law deposes and says that on August 1, 2014, he did file a Civil Action Complaint in the above-entitled matter with the Court; and that on August 5, 2014, a true and correct copy of the Civil Action Complaint was served upon Covan World-Wide Moving, Incorporated; a copy of the Return Receipt for Merchandise article number 70121640000054576257 is attached hereto and marked as Exhibit "A".

**THE MAHER LAW FIRM, P.A.**

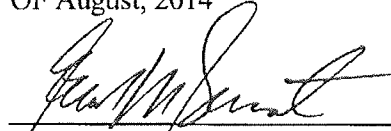
BY:



Churchill H. Huston, Esquire  
Attorney for Plaintiff(s)



SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 8<sup>th</sup> DAY  
OF August, 2014



NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL  
ETHEL M. SEMBROT, Notary Public  
City of Philadelphia, Phila. County  
My Commission Expires March 28, 2017



| SENDER: COMPLETE THIS SECTION  |  | COMPLETE THIS SECTION ON DELIVERY  |  |
|--|--|--|--|
| <p>1. Article Addressed to:</p> <p><i>Carol World-Wide Moving</i><br/> <i>1 Carol Drive</i><br/> <i>Midland City, AL 36350</i></p> |  | <p>A. Signature <i>[Signature]</i> <input type="checkbox"/> Agent</p> <p>B. Received by (Printed Name) <i>[Signature]</i> <input type="checkbox"/> Addressee</p> <p>C. Date of Delivery <i>[Signature]</i> <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p> |  |
| <p>2. Article Number<br/>(Transfer from services label)</p> <p>PS Form 3811, February 2004</p>                                     |  | <p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input type="checkbox"/> No</p>              |  |
| <p>7012 1640 0000 5457 6257</p>  |  | <p>102595-02-14-1540</p>   |  |

EXHIBIT “D”

David J. Klemann Sr. And Kathryn Klemann,  
h/w

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY, PA

Plaintiff,

vs.

JULY TERM, 2014

Covan World-Wide Moving, Incorporated;  
Coleman American Moving Services, Inc.;  
Eagle Leasing, Inc.; Jeffrey Elder; Jonathan  
A. Blaurock; JARO Transportation Services,  
Inc.; and Kathleen Hauman,

NO. 003975

Defendants

/

**AFFIDAVIT OF SERVICE**

COMMONWEALTH OF PENNSYLVANIA

:

SS

COUNTY OF PHILADELPHIA

:

CHURCHILL H. HUSTON, ESQUIRE, being duly sworn according to law deposes and says that on August 1, 2014, he did file a Civil Action Complaint in the above-entitled matter with the Court; and that on August 5, 2014, a true and correct copy of the Civil Action Complaint was served upon Jonathan a. Balurock; a copy of the Return Receipt for Merchandise article number 70121640000054575533 is attached hereto and marked as Exhibit "A".

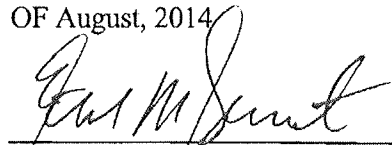
**THE MAHER LAW FIRM, P.A.**

BY:



Churchill H. Huston, Esquire  
Attorney for Plaintiff(s)

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 8<sup>th</sup> DAY  
OF August, 2014



NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

ETHEL M. SEMBROT, Notary Public  
City of Philadelphia, Phila. County  
My Commission Expires March 28, 2017



| SENDER: COMPLETE THIS SECTION  |  | COMPLETE THIS SECTION ON DELIVERY  |  |
|--|--|--|--|
| <p>1. Article Addressed to:</p> <p>Mr. Jonathan A. Blumack<br/>5324 Osage Avenue<br/>Kansas City, Kansas 66106</p> |  | <p>A. Signature <u>[Signature]</u> <input type="checkbox"/> Agent</p> <p>B. Received by (Printed Name) <u>Annette Torres</u> <input type="checkbox"/> Addressee</p> <p>C. Date of Delivery <u>8-5-14</u></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes<br/>If YES, enter delivery address below: <input type="checkbox"/> No</p>             |  |
| <p>2. Article Number<br/>(Transfer from service label)<br/>PS Form 3811, February 2004</p>                         |  | <p>3. Service Type<br/><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail<br/><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise<br/><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p> |  |
| <p>7012 1640 0000 5457 5533</p>  |  | <p>Domestic Return Receipt</p>   |  |
|  |  | 102595-02-M-1540   |  |